

Amy L. Alvarez
District Manager
Federal Government Affairs

Suite 1000 1120 20th Street, NW Washington DC 20036 202-457-2315 FAX 202-263-2601 email: alalvarez@att.com

October 18, 2002

Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: <u>Application by Verizon for Authorization To Provide In-Region, InterLATA</u> Services in State of Virginia, Docket No. 02-214

Application by Owest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington, and Wyoming. Docket No. 02-314

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Docket No. 01-338; Implementation of the Local Competition Provisions of the Telecommunications Act of the 1996, Docket No. 96-98; Deployment of Wireline Services Offering Advanced Telecommunications Capability, Docket No. 98-147

Federal-State Joint Board on Universal Service, Docket No. 96-45;

1998 Biennial Regulatory Review — Streamlined Contributor Reporting
Requirements Associated with Administration of Telecommunications Relay
Service, North American Numbering Plan, Local Number Portability, and
Universal Service Support Mechanisms, Docket No. 98-171;
Telecommunications Services for Individuals with Hearing Speech Disabilities
and the Americans with Disabilities Act of 1990, Docket No. 90-571;
Administration of the North American Numbering Plan and North American
Numbering Plan Cost Recovery Contribution Factor and Fund Size, Docket No.
92-237, NSD File No. L-00-72; Number Resource Optimization, Docket No. 99200; and Telephone Number Portability, Docket No. 95-116

Dear Ms. Dortch:

On October 17, 2002, Robert Quinn and the undersigned, both of AT&T, met with Christopher Libertelli, Legal Advisor to Chairman Powell. Participating by telephone was E. Christopher Nurse, also of AT&T.

During this discussion, AT&T explained that Verizon-Virginia fails to provide nondiscriminatory access to directory listings in accordance with checklist item eight and that Verizon's policy for provisioning loops to CLECs constitutes unlawful discrimination, extends to ordinary voice-grade loops

(not just DS3 or DS1-grade loops), precludes Verizon's loop rates in Virginia from benchmarking with Verizon's loop rates in New York, and has resulted in non-TELRIC-compliant loop rates. In addition, we discussed switching rate benchmarking and explained why the July 12 Hearing Examiner's Report and the Virginia SCC's August 1 cover letter to the Commission are not lawful orders of the SCC, and contain no findings that the Commission may give deference.

In addition to Virginia 271 issues, we briefly discussed AT&T's recently filed comments in the above-referenced Qwest 271 proceeding. The Declaration of Edward F. Stemple served as the basis of the conversation.

We also referred to AT&T's comments filed in the above-referenced Triennial Review dockets which highlight the need to establish some form of electronic loop provisioning in order to accelerate the development of facilities-based local competition. We explained that the technology to support electronic provisioning is technically feasible and available today and that electronic provisioning could eliminate some of the enormous financial and technical obstacles to facilities-based competition that currently exist.

In addition, we discussed issues related to universal service proceeding, including the dangers of not moving from a revenue based assessment mechanism effective April 1, 2002. We also discussed how a telephone number assessment mechanism could be implemented by April 1, 2003.

The positions expressed during this meeting were consistent with AT&T's previously filed comments in the respective dockets. One electronic copy of this Notice is being submitted in each of the above-referenced proceedings in accordance with Section 1.1206 of the Commission's rules.

Sincerely, amy falvancy

cc:

Christopher Libertelli Janice Myles Uzoma Onyeije Gary Remondino Victoria Schlesinger